

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

STATE OF TEXAS, *et al.*,

Plaintiffs,

V.

UNITED STATES OF AMERICA, *et al.*,

Defendants,

and

KARLA PEREZ, *et al.*,

Defendant-

Intervenors.

Case No. 1:18-CV-68

DEFENDANT INTERVENORS' EXHIBIT LIST

Pursuant to the parties' Agreement Regarding Discovery on Plaintiff States' Motion for Preliminary Injunction Discovery, dated June 6, 2018, Defendant Intervenors Karla Perez, *et al.* hereby disclose their list of exhibits for post-discovery briefing. Defendant Intervenors also incorporate by reference the exhibit lists disclosed by the State of New Jersey, the Federal Defendants, and the Plaintiff States. Pursuant to the parties' agreement, Defendant Intervenors' list does not include documents received during the discovery period for the preliminary injunction or the documents already attached to either Plaintiff States' motion for preliminary injunction or their complaint. Defendant Intervenors reserve the right to amend or supplement this list as needed.

NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
1	USCIS Letter to Hon. Charles E. Grassley, Chairman, Committee on the Judiciary, April 17, 2015				
2	USCIS Letter to Hon. Charles E. Grassley, Chairman, Committee on the Judiciary, June 29, 2016				
3	DACA Terminations Related to Criminal and Gang Activity by Fiscal Year				
4	The Washington Post Article, September 7, 2017, "Did Obama allow a 'back door' to citizenship through DACA?"				
5	Mem. from Jeh Charles Johnson, Secretary, USDHS, to Thomas Winkowski <i>re: Policies for the Apprehension, Detention and Removal of Undocumented Immigrants</i> , Nov. 20, 2014				
6	Mem. from John Morton, Director, USDHS, to All ICE Employees <i>re: Civil Immigration Enforcement: Priorities for the Apprehension, Detention, and Removal of Aliens</i> , March 2, 2011				
7	Mem. from John Morton, Director, USDHS, to All Field Directors, All Special Agents in Charge, All Chief Counsel <i>re Prosecutorial Discretion Consistent with Civil Immigration Enforcement Priorities of the Agency for the Apprehension, Detention and Removal of Aliens</i> , June 17, 2011				
8	Written Testimony of Stephen H. Legomsky, Jan. 28-28, 2015				
9	Fiscal Year 2016 Report to Congress, USCIS Advance Parole Documents, January. 6, 2017				
10	USDHS, National Standard Operating Procedures (SOP) Deferred Action for Childhood Arrivals (DACA) Form I-8221D and Form I-765, Apr. 4, 2013				
11	Decl. of Donald W. Neufeld, Jan. 30, 2015				
12	Decl. of Michael Hoefer, Jan. 30, 2015				
13	Mem. from Doris Meissner, Immigration and Naturalization Service Commissioner to Regional Directors, <i>Exercising Prosecutorial Discretion I</i> , Nov. 17, 2000				
14	Sam Bernsen, Immigration and Naturalization Service General Counsel,				

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	Legal Opinion Regarding Service Exercise of Prosecutorial Discretion 1, July 15, 1976				
15	Decl. of Shoba Sivaprasad Wadhia, Dec. 15, 2017				
16	USCIS Form I-821D, Consideration of Deferred Action for Childhood Arrivals, Jan. 9, 2017				
17	USCIS, Deferred Action for Childhood Arrivals (DACA) Toolkit: Resources for Community Partners				
18	Mem. From Office of Programs to Regional Directors, District Directors, Officers-in-Charge, Service Center Directors, <i>re Supplemental Guidance on Battered Alien Self-Petitioning Process and Related Issues</i> , May 6, 1997				
19	American Immigration Council, Executive Grants on Temporary Immigration Relief, 1956-Present, Oct. 2014				
20	No. 14-10049, <i>Crane v. Johnson</i> , Brief of the Federal Appellees/Cross-Appellants				
21	No. 15-674, <i>United States v. Texas</i> , Brief of Former Federal Immigration and Homeland Security Officials as Amici Curiae in Support of The United States				
22	Letter from Office of the Attorney General, State of CA to President Trump, July 21, 2017				
23	USCIS, Number of Form I-821D, Consideration of Deferred Action for Childhood Arrivals, by FY, Quarter, Intake, Biometrics and Case Status FY 2012-2017, (March 31)				
24	FOIA Response by DHS to Shoba Sivaprasad Wadhia, March 4, 2013				
25	USCIS, Number of Form I-821D, Consideration of Deferred Action for Childhood Arrivals, by FY, Quarter, Intake, Biometrics and Case Status FY 2012-2018, (March 31, 2018)				
26	Decl. of Jorge A. Aguilar, Oct. 25, 2017				
27	Decl. of David R. Anderson, Oct. 23, 2017				
28	Decl. of Ron Anderson, Oct. 25, 2017				
29	Decl. of Dr. Clarence Braddock III, Oct. 25,				

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	2017				
30	Decl. of Shawn Brick, Oct. 23, 2017				
31	Decl. of Sara H. Cody, M.D., Oct. 26, 2017				
32	Decl. of Alan Essig, Meg Wiehe and Misha Hill, Oct. 26, 2017				
33	Decl. of Lisa M. Gonzales, Oct. 26, 2017				
34	Decl. of Jens Hainmueller and Duncan Lawrance, Oct. 23, 2017				
35	Decl. of Ralph J. Hexter, Oct. 24, 2017				
36	Decl. of Dr. Robin Holmes-Sullivan, Oct. 24, 2017				
37	Decl. of Catherine Lucey, Oct. 27, 2017				
38	Decl. of Dr. James L. Madara, MD				
39	Decl. of Kevin M. Maxwell, Ph.D., Oct. 26, 2017				
40	Decl. of Anne McLeod, Oct. 24, 2017				
41	Decl. of Nick Melvoin, Oct. 29, 2017				
42	Decl. of Fernando S. Mendoza, Oct. 29, 2017				
43	Decl. of Robert Menicocci, Oct. 27, 2017				
44	Decl. of Eloy Ortiz Oakley, Oct. 26, 2017				
45	Decl. of Deirdre O'Brien, Sept. 21, 2017				
46	Decl. of Brian Rosenberg, Oct. 23, 2017				
47	Decl. of Thomas S. Sayles, Sept. 21, 2017				
48	Decl. of Jonathan Schwartz, Oct. 30, 2017				
49	Decl. of Marcelo M. Suarez-Orozco, Oct. 27, 2017				
50	Decl. of Geoffrey H. Young, PhD, Oct. 26, 2017				
51	Decl. of Brad Wells, Oct. 31, 2017				
52	Pew Research Center, "As Growth Stalls, Unauthorized Immigrant Population Becomes More Settled, Sept. 3, 2014				
53	Mem. From Stuart Anderson, USDJ, INS, to Johnny Williams <i>re Deferred Action for Aliens with bona fide Applications for T Nonimmigrant Status</i> , May 8, 2002				
54	Mem. From William Yates, USDHS to Director, Vermont Service Center, <i>re Centralization of Interim Relief for U Nonimmigrant Status Applicants</i> , Oct. 8, 2003				
55	USCIS Press Release "USCIS Announces Interim Relief for Foreign Students				

NO.	DESCRIPTION	OFFR	OBJ	DATE	
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	Adversely Impacted by Hurricane Katrina”, November 25, 2005				
56	Mem. From Donald Neufeld, USCIS, to Field Leadership <i>re Guidance Regarding Surviving Spouses of Deceased U.S. Citizens and their Children</i> , Sept. 4, 2009				
57	Mem. From Donald Neufeld, USCIS, to Executive Leadership <i>re Additional Guidance Regarding Surviving Spouses of Deceased U.S. Citizens and Their Children (REVISED)</i> , December 2, 2009				
58	Open Letter from Leaders of American Industry, October 30, 2017				
59	Videotaped Deposition of James McCament, Oct. 17, 2017				
60	Videotaped Deposition of James D. Nealon Oct. 13, 2017				

Dated: June 15, 2018

Respectfully submitted,

**MEXICAN AMERICAN LEGAL
DEFENSE AND EDUCATIONAL FUND**

By: /s/ Nina Perales

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that, on the 15th day of June, 2018, I served a copy of this document by electronic mail to all counsel of record.

/s/ Nina Perales
Nina Perales